

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

v.

[2] JULIO HERRERA VELUTINI

Defendant.

CRIMINAL NO. 22-342 (SCC)

MOTION TO JOIN DOCKET NO. 677

TO THE HONORABLE COURT:

COMES NOW, Defendant Julio Herrera Velutini (Mr. Herrera), by and through the undersigned counsel, and respectfully states and prays as follows:

1. On September 26, 2024, Defendant Mark Rossini (Mr. Rossini) filed a “Motion to Dismiss and Request for Evidentiary Hearing” (Dkt. 677).

2. Mr. Herrera hereby joins and adopts by reference all the *legal arguments* presented by Mr. Rossini at Dkt. 677. Mr. Herrera has also on this date submitted his own motion to dismiss. See Dkt. 688.

WHEREFORE, Mr. Herrera respectfully requests the Court to GRANT this motion and permit Mr. Herrera to join in the legal arguments set forth in Dkt. 677.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this October 2, 2024.

CONTINENTAL PLLC

/s/ Christopher M. Kise

Christopher M. Kise (FBN 855545)

Admitted Pro Hac Vice

Primary Email: ckise@continentalpllc.com

Secondary Email:

cforjet@continentalpllc.com

101 North Monroe Street, Suite 750

Tallahassee, FL 32301

Telephone: (850) 332-0702

DLA Piper (Puerto Rico) LLC

/s/ Sonia I. Torres-Pabón

Sonia I. Torres-Pabón (USDC-PR No. 209310)

sonia.torres@us.dlapiper.com

500 Calle de la Tanca, Ste. 401

San Juan, PR 00901-1969

Tel: 787-281-8100

The LS Law Firm

/s/ Lilly Ann Sanchez

Lilly Ann Sanchez, Esq. (Fla. Bar No.
195677)

Email: lsanchez@thelsfirm.com

One Biscayne Tower, Suite 2530
South Biscayne Blvd.
Miami, Florida 33131
Telephone: (305) 503-5503
Facsimile: (305) 503-6801

CERTIFICATION

IT IS HEREBY CERTIFIED that on this same date, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Sonia I. Torres-Pabón
Sonia I. Torres-Pabón